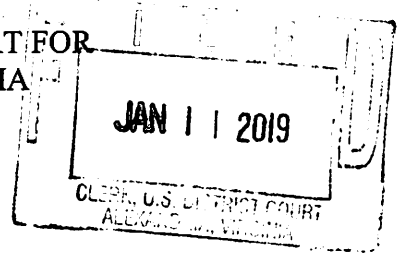


IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

CHRISTOPHER WARREN LAPP,

Defendant.

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)

Criminal No. 1:19-MJ- 16-TCB

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jordan C. Sampson, being duly sworn, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January 25, 2015. As such, I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 924(c), 18 U.S.C. § 2113 and 18 U.S.C § 2119(a).

2. During my employment as an FBI Special Agent, I have been assigned to investigate violations of federal law, including robberies of banks, credit unions, and commercial establishments. I have training and experience in the area of robbery investigations, interview and interrogation, and evidence recovery. I am currently assigned to the Washington Field Office, Northern Virginia Violent Crimes Task Force.

3. This affidavit is submitted in support of a criminal complaint charging CHRISTOPHER WARREN LAPP with using, carrying, and possessing a firearm during and in relation to a crime of violence and in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c).

4. The factual information supplied in this affidavit is based upon my investigation and information provided to me orally and in written form by other law enforcement officers. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of reports, documents, and physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause. It is not intended to include each and every fact and matter observed by me or known to the United States.

RELEVANT STATUTES

5. 18 U.S.C. § 2113(a) provides in part: “whoever, by force and violence, or by intimidation, takes...from the person or presence of another, or obtains...by extortion any property or money or any thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association” shall be guilty of an offense.

6. 18 U.S.C. § 2113(d) provides in part: “whoever, in committing or attempting to commit, [an] offense defined in subsection (a)... of this section, assaults any person, or puts in jeopardy the life of any person by the use of a dangerous weapon or device, shall be fined under this title or imprisoned not more than twenty-five years or both.”

7. 18 U.S.C. § 2119 provides in part: “whoever with the intent to cause death or serious bodily harm takes a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from the person or presence of another by force and violence or by intimidation, or attempts to do so shall be [guilty of an offense.]”

8. 18 U.S.C. § 924(c)(1)(A) prohibits a person from using or carrying or brandishing a firearm during and in relation to a crime of violence, or possessing a firearm in furtherance of a crime of violence. If a firearm is brandished, an increased mandatory minimum penalty applies. *See* § 924(c)(1) (A)(ii).

Factual Basis Supporting Probable Cause

9. On November 13, 2018, at approximately 1139 hours, an employee of the Wells Fargo Bank located at 750 Walker Road, Great Falls, Virginia reported to the Fairfax County Police Department (FCPD) that an unknown subject had robbed the institution. The FCPD and FBI responded to the scene to investigate the robbery. Upon arrival of FCPD patrol units, they identified a Wells Fargo Bank victim employee (hereinafter referred to as “Victim #1”). Victim #1 stated that an unknown male subject entered the bank and approached the teller counter. The subject produced a note demanding money and pointed a gun at Victim #1. Victim #1 complied and gave the subject all of the U.S. currency from the teller station drawer¹. The subject took a plastic bag from a trashcan in the lobby of the bank and had Victim #1 place the money in it. The subject departed the bank on foot and demanded car keys from Victim #2 and stole Victim #2’s Lexus GX470 SUV² from the parking lot.

¹ Wells Fargo Bank is a member of the Federal Deposit Insurance Corporation. Deposits made at Wells Fargo are covered by FDIC insurance.

² Photographs taken from inside Victim #2’s Lexus reveal labels showing it was made in Japan.

10. The Wells Fargo Bank video surveillance depicted a male subject wearing a dark colored baseball style hat, a beige colored facemask, dark colored sunglasses, a tan colored zip up style jacket, a blue colored shirt, dark colored pants, multi colored running style shoes and dark gloves. Victim #1 was shown a sheet that include multiple different types of handguns and selected the Glock handgun as the weapon used by the subject. Victim #1 further described the gun as silver and black in color with a blue cloth covering it.

11. The FCPD conducted a search of the area and located Victim #2's stolen vehicle in the area of Pamlico Lane in Fairfax County, where it had been abandoned. A FCPD K-9 unit tracked from the location of the vehicle to the rear entrance of 9314 Arnon Chapel Road, Great Falls, Virginia. FCPD made contact with the homeowner, CHRISTOPHER WARREN LAPP, outside the residence. With LAPP's consent, the FCPD SWAT team conducted a protective sweep of the residence and located several \$100 dollar bills on the basement floor. LAPP was wearing a blue shirt, dark colored pants, and multi colored shoes that matched the physical description of the subject from the bank robbery.

12. During a field interview with FCPD, LAPP indicated that he was renting the residence at 9314 Arnon Chapel Road to another family and he lived at an apartment in Purcellville, Virginia. In addition, LAPP admitted he owned a Glock handgun and it was inside the residence. LAPP appeared to be wearing shoes similar to those of the subject from the bank robbery. LAPP consented to a photograph being taken of the bottom of his shoe. The picture was sent to FCPD crime scene detectives at the scene of the bank robbery who advised there was a shoe impression on the floor of the bank that matched the shoes LAPP was wearing.

13. FCPD interviewed a neighbor of LAPP who advised they had a camera outside their home that was facing the street and would have recorded events from that morning. FCPD

reviewed the video and observed LAPP walking down the street toward his residence with a plastic bag in his hand.

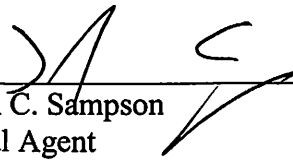
14. LAPP was arrested by FCPD and transported to the Fairfax County Public Safety Headquarters in Fairfax, Virginia where he was interviewed by FCPD Detective Paul Cable and the Affiant. LAPP was given a *Miranda* form to read and was read a *Miranda* warning out loud. LAPP signed the waiver and consented to speak with investigators without legal counsel present. LAPP admitted to robbing the Wells Fargo Bank located at 750 Walker Road, Great Falls, Virginia and carjacking Victim #2. LAPP admitted the weapon used in the robbery was a black Glock handgun that he had purchased and wrapped with grey duct tape around the barrel and handle. LAPP stated the handgun was located in the office desk of his residence at 9314 Arnon Chapel Road, Great Falls, Virginia.

15. On November 13, 2018, at approximately 1908 hours, FCPD and members of the FBI Northern Virginia Violent Crimes Task Force executed a search warrant at 9314 Arnon Chapel Road, Great Falls, Virginia. FCPD seized the following items of note during the search; a tan jacket with beige pantyhose in the pocket, one dark glove, a money band, a plastic trash bag, a large amount of U.S. currency (approximately \$14,590 recovered from the basement floor and basement wall) and a fully loaded black Glock handgun wrapped with grey duct tape. FCPD conducted a separate search warrant for Victim #2's vehicle the following day and seized a pair of black sunglasses, a dark baseball style hat and a blue cloth.

Conclusion


16. Based on the foregoing, there is probable cause to believe that on November 13, 2018, CHRISTOPHER WARREN LAPP used, carried, and brandished a firearm during and in

relation to a crime of violence, and possessed a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c).



Jordan C. Sampson
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me this 11th day of January, 2019.

 /s/_____
Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa C. Buchanan
United States Magistrate Judge